Federal Communications Commission
Office of Engineering and Technology
Laboratory Division

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GUIDELINES FOR LABELLING AND USER INFORMATION FOR DEVICES SUBJECT TO PART 15 AND PART 18

1. General

This document provides a guide to the applicable rule sections for labelling, and information provided to users, required for authorization of Part 15 and Part 18 Radio Frequency (RF) equipment.

Labelling is determined by the type of equipment authorization procedure, or procedures, required for a specific RF device. The procedure is determined by the rule parts regulating the specific type of equipment. In some cases, multiple authorization procedures may be required (see section 7, Multiple Authorization Procedures, below).

The label requirements are based on a determination of the applicable equipment authorization procedure or procedures (Verification, Declaration of Conformity (DoC) or Certification) for the specific RF equipment.

The following provides the applicable references to the FCC rule sections for equipment authorization procedures; and the pertinent information and/or the specific equipment authorization procedure required for different types of equipment:

- Part 2 Subpart J – General equipment authorization procedures applicable for all types of equipment;

- Part 15 Subpart A (Section 15.3) – General definitions of unlicensed, unintentional, and intentional radiators; and digital Class A and Class B devices;

- Part 15 Subpart B (Section 15.101) – Equipment authorization procedures for unintentional radiators;

- Part 15 Subpart C (Section 15.201), Subpart D (Section 15.305), Subpart E (Section 15.405), Subpart F (Section 15.505) and Subpart G (Section 15.607) – Identify applicable procedures for intentional radiators and Subpart H—Television Band Devices;

- Part 18 Subpart B (Section 18.203) – General information regarding applications and authorizations for industrial, scientific and medical (ISM) equipment.

For copies of the FCC rules, see http://www.fcc.gov/oet/info/rules/.

2. Labelling Requirements for Part 15 Devices:

2.1 Verification

The specific labelling requirements for a device subject to the Verification procedure are contained in Section 15.19(a). These labelling requirements are:

If the device is subject only to Verification, include a label bearing a unique identifier[1] (Section 2.954) and one of three compliance statements specified in Section 15.19(a). If the labelling area for the device is so small, and/or it is not practical to place the compliance statement on the device, then the statement can be placed in the user manual or product packaging (Section 15.19(a)(5)). However, the device must still be labelled with the unique identifier (Verification). Generally, an area for labeling smaller than the palm of the hand is considered too small for the compliance statement.

2.2 Certification

If the device is subject to Certification: (1) Section 2.925 contains information on identification of the equipment; (2) include a label bearing an FCC Identifier (FCC ID) (Section 2.926) and (3) include the appropriate compliance statement in Section 15.19(a). If the labelling area is considered too small and therefore it is impractical (smaller than the palm of the hand) to display the compliance statement, then the statement may be placed in the user manual or product packaging. However, the device must still be labelled with the FCC ID. If the device is unquestionably too small for the FCC ID to be readable (smaller than 4-6 points), the FCC ID may be placed in the user manual. However, it must be determined that the device itself is too small – the label area allocated to the FCC ID may not be reduced because of over crowded identification of other product and regulatory information. Justification for placing the FCC ID in the manual must be submitted with the initial application for certification for review and approval.

Electronic display of the FCC ID may be used for Certification for devices that have an integrated display screen in lieu of a physical label or nameplate. See attachment 784748 D02 e labeling for e-labelling guidance.

2.3 Declaration of Conformity (DoC):

The labelling requirements for a device subject to the DoC procedure are specified in Section 15.19(b). The label should include the FCC logo along with the Trade Name and Model Number, which satisfies the unique identifier requirement of Section 2.1074 if it represents the identical equipment tested for DoC compliance and a statement, similar to Verification defined in §15.19(a)(3). For personal computers assembled from authorized components, the following additional text must also be included: “Assembled from tested components,” “Complete system not tested.”

When the device is so small and/or when it is not practical to place the required additional text on the device, the text may be placed in the user manual or pamphlet supplied to the user. However, the FCC logo, Trade Name, and Model Number must still be displayed on the device (Section 15.19(b) (3)).

Electronic display of the FCC logo may be used for devices that have an integrated display screen in lieu

[1] Products must be uniquely identified (trade name, and model number, etc.) by the person responsible for marketing or importing the equipment to ensure that products can be properly identified in the event the FCC request documentation, for compliance, and or samples.

of a physical label or nameplate. See attachment 784748 D02 e labeling for e-labelling guidance.

Part 15 Declaration of Conformity (DoC) Label Examples

3. Labelling Requirements for Part 18 Devices:

Equipment that intentionally generates radio frequency energy for non-telecommunications functions for industrial, scientific, medical (ISM) or other purposes must be authorized and labelled according to the procedures outlined in Part 2, Subpart J, Sections 18.203 and 18.209.

Non-consumer ISM equipment is authorized under the Verification procedure. Consumer ISM equipment is authorized under either the Declaration of Conformity or Certification procedure, except that consumer ultrasonic equipment generating less than 500 watts and operating below 90 KHz is subject to the Verification procedure.

Labelling for Verification requires a unique identifier (Section 2.954) to facilitate positive identification of the Verified device. The identification should not be confused with the FCC ID used on devices subject to Certification

Labels for Part 18 devices subject to Certification require an FCC ID as described in Section 2.926.

For Declaration of Conformity, the device shall be permanently labelled with the Part 18 logo (Section 18.209) illustrated below, in addition to a unique identifier (Section 2.1074) to facilitate positive identification.

Part 18 Declaration of Conformity (DoC) Logo

4. Label Location for Part 15 and 18 Devices:

The label or statement shall be etched, engraved, stamped, indelibly printed, or permanently affixed to a permanently attached part of the equipment, and be visible at the time of purchase on the exterior of the equipment enclosure.

As an option to placing the FCC label on the exterior of the device, the FCC label may be placed in a user accessible area if the following conditions are met:

- The device is handheld (notebook computers are considered as handheld);

- The FCC identifier is visible at the time of purchase. Marketing the device without the battery installed when the label is in the battery compartment is acceptable. The FCC ID on the box, or additional documentation directing the user where to find the FCC label, also satisfies this requirement;

- The user accessible area must not require any special tools for access, and the FCC label must not be placed on a removable part;

- The FCC ID, Model Number, or FCC logo must be on the label and must meet all general labelling requirements or policies that apply for Certification, Verification or DoC.

5. User Manual and User Information for Part 15 Devices:

Section 15.21 requires that in the user manual, the user shall be cautioned that changes / modifications not approved by the responsible party could void the user's authority to operate the equipment. The acceptable formats for user information dissemination are paper, computer disk or over the Internet. Where special accessories such as shielded cables and/or special connectors are required to comply with the emission limits, the instruction manual shall include appropriate instructions on the first page of the text describing the installation of the device (Section 15.27(a)).

For a Class A or Class B digital device (unintentional radiator), as well as any composite device that is both an intentional and unintentional radiator, the text specified in Section 15.105 must be placed in the user manual.

Devices authorized under the DoC procedure must also include a compliance information statement (in the user manual or on a separate sheet) as required by Section 2.1077. The objective of this compliance statement is to allow the FCC to associate the equipment with the party responsible for compliance with the identification, by name, address and telephone number, of the responsible party, as defined in §2.909. The responsible party for a Declaration of Conformity must be located within the United States.

Additional statements and information may be required for compliance to specific or general rule parts. The following are examples of some additional user information requirements. The party responsible for compliance must provide any additional statement(s) required:

• Kits - TV interface and cable system terminal device marketed as kits: Section 15.25(d);

• TV interface devices, including cable system terminal devices: Section 15.115 (c)(5);

• Labelling of digital cable ready products: Section 15.123 - use of the term "cable ready/compatible";

• External power amplifiers and antenna modifications: Section 15:204(d)(2) - notice of authorized amplifiers;

• Cordless telephones: Section 15.214(c) & (d)(3) - privacy statement & security code statement;

• Cordless telephones: Section 15.233(b)(2)(ii) - interference to TV;

• Cordless telephones: Section 15.233(h) - cordless telephones without digital security (Section 15.214);

• Professionally installed systems: Section 15.247(c)(1)(iii);

• Operation within the band 92-95 GHz: Section 15.257(a)(4) - indoor use only;

• Unlicensed PCS: Section 15.311 - notification and co-ordination with UTAM, Inc.;

• RF exposure statements: Section 2.1091(d) (3) - Mobile devices (a minimum separation distance may be required).

6. User Manual and User Information for Part 18 Devices:

For all industrial, scientific, medical (ISM) devices, the instruction manual or, if no instruction manual is provided, the product packaging, must provide information that addresses the following: (1) interference potential of the device, (2) maintenance of the system and (3) simple measures that can be taken to correct interference. RF lighting devices must add a statement similar to the following: "This product may cause interference to radio equipment and should not be installed near maritime safety communications equipment, ships at sea or other critical navigation or communications equipment operating between 0.45-30 MHz." (Section 18.213)

In addition, Part 18 devices that are authorized under the DoC procedure shall also include in the instruction manual, on a separate sheet, or on the packaging the following: (1) identification of the product (e.g. name and model number), (2) a statement similar to "This device complies with Part 18 of the FCC Rules" (Section 18.212), and (3) the name and address of the responsible party (Section 2.909).

7. Multiple Authorization Procedures:

A device subject to multiple authorization procedures requires appropriate testing and labelling for each of the respective authorization procedures. As a general rule, the DoC text statement supersedes any Verification statement. For devices subject to DoC and Verification, or Certification and Verification, the labelling requirements for DoC or Certification need only apply. When a device is authorized under both the DoC and Certification procedures, the DoC logo and FCC ID (or FCC IDs if applicable) are required.

This requirement does not negate the testing requirement for each individual device that is subject to both multiple authorization procedures, and / or multiple technical rules. For example, an 802.11 Wi-Fi device that is also a Class B personal computer peripheral digital device must be tested as a computer peripheral (Section 15.3) and as a transmitter (Section 15.247). If the procedure for testing the computer peripheral elected DoC and since the transmitter requires certification, the device must be labelled with the DoC logo and an FCC ID. If the computer peripheral elected Certification then the device can be certified as a computer peripheral and a transmitter under one FCC ID.

When supplying information to users, all relevant instructions that pertain to all components of a composite device are required. For example, Class A or Class B statements in Section 15.105; all warning statements and special instructions as required by Sections 15.21 and 15.27; and all Part 18 applicable instructions must be clearly stated. Variations in editing to clarify the language and structure are permitted if all the relevant points applicable to all of the components are represented.

8. Certified Transmitter Modules:

Certified transmitter modules (CTM) (Section 15.212) are distinctive assemblies containing a transmitter that can be installed inside a host device (i.e. computer, wireless security controller, etc.) These devices can be sold by a manufacturer (responsible party) to other equipment manufacturers or used in the original manufacturer's products. When a certified modular is used inside a host, the host equipment can take advantage of the certification already granted to the module. This may reduce some of the tests for the host, compared to using a transmitter that has not been previously certified. The host containing a certified modular (for example a laptop with WiFi) may only require testing for DoC or Certification as a Class B computer, and possibly a subset of additional tests associated with the transmitter. The alternative, using a non-certified transmitter, requires DoC or Certification as a Class B computer, and in addition full certification of the transmitter. (See FCC 07-56). Any additional testing, conditions of use and limitations associated with the certified module must be provided in the module instruction manual by the manufacturer of the module, to the Other Equipment Manufacturer (OEM) marketing the host.

A certified modular has the option to use a permanently affixed label, or an electronic label (See attachment 784748 D02 e labeling for e-labelling guidance). All modules without an integrated display on the module must be labelled with a module's FCC ID - Section 2.926. The module's OEM manual must provide clear instructions explaining to the host integrator the labelling requirements, options and OEM user manual instructions that are required (see next paragraph).

For a host manufacture's using a certified modular, if (1) the module's FCC ID is not visible when installed in the host, or (2) if the host is marketed so that end users do not have straightforward commonly used methods for access to remove the module so that the FCC ID of the module is visible; then an additional permanent label referring to the enclosed module: "Contains Transmitter Module FCC ID: XYZMODEL1" or "Contains FCC ID: XYZMODEL1" must be used. The host OEM user manual must also contain clear instructions on how end users can find and/or access the module and the FCC ID.

For guidance for electronic labeling for modules and host using modules see attachment 784748 D02 e labeling for e-labelling guidance.

9.2 Software Defined Radios:

A software defined radio (Section 2.944) may provide permanently affixed labels according to standard Certification labelling requirements (see 2.2 Certification (labelling requirements) above) or electronic labelling.

A software defined radio using Electronic label may use a built-in display on the device or provide a standard electrical interface. The electrical interface must be an industry standard using commonly used protocols and methods to permit easy local access (http through a browser, Telnet or ASCII serial interface using standard terminal emulation, hyper terminal, etc.) The user manual must provide a description of the method for using basic commands to access the FCC ID. Access to the FCC ID shall be obtained without any security (user name, password, etc.) unless all types of access require some security, and then access to the FCC ID must be obtained through the lowest security level defined for the end user of the system.

Change Notice:

07/11/2014: 784748 D01 Labelling Part 15 &18 Guidelines v08 replaces 784748 D01 Labelling Part 15 &18 Guidelines v07. Changes were made to reference new guidelines for electronic labeling in the new attachment 784748 D02 e labeling v01 for e-labelling guidance.